

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

**Case No.: 1:22-cv-1032 (PKC) (JRC)**

**DECLARATION**

SAFA ABDULRAHIM GELARDI, VITO GELARDI,  
GREGORY ELEFTERAKIS, ROMAN POLLAK,  
ANTHONY BRIDDA, IME COMPANIONS LLC,  
CLIENT EXAM SERVICES LLC, and  
IME MANAGEMENT & CONSULTING LLC,

Defendants.

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I, Jamie S. Felsen, Esq., pursuant to 28 U. S.C. § 1746, declare as follows:

1. I am a member of the law firm Milman Labuda Law Group PLLC (“MLLG”), counsel for IME WatchDog, Inc. (hereinafter “Plaintiff”) in the above-referenced case.

2. ECF Docket Entry 381 reflects a true and accurate copy of Plaintiff’s Memorandum of Law in Opposition to Defendants Gregory Elefterakis, Roman Pollak, and Anthony Brida’s Motion to Dismiss the Complaint that my office emailed to counsel for the defendants on October 18, 2023 which was inadvertently not filed once the motion was fully briefed.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 13, 2024.

**MILMAN LABUDA LAW GROUP PLLC**

/s/Jamie S. Felsen

Jamie S. Felsen, Esq.